

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ADAM ANKELE : CIVIL ACTION
Plaintiff :
v. :
MARCUS G. HAMBRICK, :
Defendant. : NO. 02-4004

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

Defendant Trooper Hambrick, by and through his attorney, Theodore E. Lorenz, Deputy Attorney General, hereby proposes that the following questions be asked of potential jurors for this case:

1. Does anyone know the plaintiff or his counsel?
2. Does anyone know the defendant, Trooper Marcus Hambrick, or his attorney, Theodore Lorenz?
3. Have you or anyone you are close to had an encounter with law enforcement or otherwise have an opinion regarding law enforcement which might effect your ability to hear this case and judge it fairly and impartially?
 - A. If yes, please explain.
4. Have you or anyone close to you been stopped or arrested by the police for driving under the influence of alcohol?
 - A. If yes, might that effect your ability to hear this case and judge it fairly and impartially?

5. Has anyone been otherwise so exposed to an arrest, either themselves, a family member, or close friend, that you could not fairly and impartially hear a case involving alleged police misconduct?

A. If yes, please explain.

6. Have you or anyone close to you ever filed a lawsuit or ever been sued?

A. If yes, please describe.

B. If yes, might that effect your ability to hear this case and judge it fairly and impartially?

7. Has anyone served on a jury before, and if so, did you reach a verdict in the case?

8. Does anyone have a particular circumstance or condition that would prevent him/her from sitting for a period of time to hear this case?

9. This case may take up to 3 days, and if so, does that impose an extraordinary circumstance for anyone?

10. Would you have difficulty rendering a fair and impartial verdict based upon the evidence and existing law, even if you did not agree with the existing law?

11. Does anyone think that just because someone files a suit that the suit has merit and the person is entitled to a judgment?

12. Does anyone have difficulty hearing and understanding English or what is transpiring in the courtroom?

D. MICHAEL FISHER
ATTORNEY GENERAL

BY: ss/Theodore E. Lorenz
Theodore E. Lorenz
Deputy Attorney General
Identification No. 67795

Office of Attorney General
21 S. 12th Street, 3rd Floor
Philadelphia, PA 19107-3603
Telephone No. 215-560-2982